

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ROCKWELL AUTOMATION)	
TECHNOLOGIES, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:12-cv-10274-GCS-MKM
v.)	
)	Honorable George Caram Steeh
SECURE CROSSING RESEARCH)	
AND DEVELOPMENT INC.,)	
)	
Defendant.)	

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to this Court's Rule 26(f) and Case Management Order dated May 11, 2012, the Scheduling Order dated October 30, 2012 and the Stipulated Order Extending Time to File Joint Claim Construction Statement dated January 22, 2013, Plaintiff Rockwell Automation Technologies, Inc. ("Rockwell") and Defendant Secure Crossing Research and Development Inc. ("Secure Crossing") provide a Joint Claim Construction Chart, attached as Exhibit A, listing the claim terms in issue in this case, along with the parties' proposed constructions and supporting citations to intrinsic and extrinsic evidence.

Also attached as Exhibit B is a copy of U.S. Patent No. 7,990,967 B2 ("the '967 Patent"). All proposed constructions are preliminary and subject to revision. Either party's proposal of constructions does not, in itself, mean that the party contends that any of these terms should be given a meaning other than its ordinary meaning, or that the party believes at this time that the meaning of any of these terms necessarily will ultimately be disputed by the parties. Furthermore, the parties submit their claim constructions without the benefit of complete

discovery. Therefore, the parties explicitly reserve the right to clarify, alter, amend, modify or supplement these preliminary proposed constructions for any reason. Each party also explicitly reserves the right to amend these preliminary proposed constructions in response to amendments to constructions proposed by the other party, based on further discovery, or based on their continuing analyses. The parties stand ready to meet and confer further to further narrow the disputes they present to the Court.

Dated: January 31, 2013

/s/Deborah J. Swedlow

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January, 2013 a copy of the foregoing was electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record.

Dated: January 31, 2013

/s/ Deborah J. Swedlow
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